

# **Exhibit 40**

## **(REDACTED)**

This Exhibit contains the specific pages of the deposition Plaintiffs are referencing. The entire deposition was separately filed in the record pursuant to LR 5.1 and the M.D. Ga. CM/ECF Administrative Procedures Manual.

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2       IN THE UNITED STATES DISTRICT COURT  
3                   MIDDLE DISTRICT OF GEORGIA  
4                   COLUMBUS DIVISION

5       WILHEN HILL BARRIENTOS,       )  
6       ET AL,                        )  
7                                      )  
8       Plaintiffs,                 )  
9                                      ) CIVIL ACTION NO.  
10      v.                            )  
11                                    ) 4:18-cv-00070-CDL  
12      CORECIVIC, INC.,            )  
13                                    )  
14      Defendant.                 )

15                                    DEPOSITION OF JACQUELINE NORMAN

16                                    ATLANTA, GEORGIA

17                                    MONDAY, NOVEMBER 15, 2021

18                                    (Reported Remotely)

19  
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22  
23   REPORTED BY: TANYA L. VERHOVEN-PAGE,  
24                                    CCR-B-1790

25   JOB NO. 201677

November 15, 2021

9:24 a.m.

## Deposition of

JACQUELINE NORMAN, held in Atlanta,

Georgia before Tanya L. Verhoven-Page,

## Certified Court Reporter and Notary Public

of the State of Georgia.

1 APPEARANCES OF COUNSEL

2 VIA ZOOM

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4

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6 On behalf of the Plaintiffs:

7 PERKINS COIE

8 2901 North Central Avenue

9 Phoenix, Arizona 85012

10 BY: MIKAELA COLBY, ESQ.

11

12 SOUTHERN POVERTY LAW CENTER

13 400 Washington Avenue

14 Montgomery, Alabama 36104

15 BY: CAITLIN SANDLEY, ESQ.

16 MEREDITH STEWART, ESQ.

17 REBECCA CASSLER, ESQ.

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19 On behalf of the Defendant:

20 STRUCK LOVE BOJANOWSKI & ACEDO

21 3100 West Ray Road

22 Chandler, Arizona 85226

23 BY: JACOB LEE, ESQ.

24

25

1 J. NORMAN

2 A I was promoted to Chief of Unit  
3 Management in October of 2017, and then I went to  
4 Adams, which is in Mississippi.

5 Q And then what happened after that?

6 A In March of 2020, I went to Stewart as  
7 the Chief of Unit Management. I made a lateral  
8 position, and then of June of 2021, I came here to  
9 Trousdale Turner.

10 Q And that was as Assistant Warden?

11 A Yes.

12 Q And before working for CoreCivic, did you  
13 have another job?

14 A When -- before coming to CoreCivic, I  
15 worked with Coastal Correctional, which is a  
16 department of corrections, which is in Georgia. I  
17 did the RSAT program which is a treatment center, a  
18 drug treatment, and I also worked with mental health,  
19 Statesboro Mental Health, which was called Pineland,  
20 and I also worked for the Department of Children &  
21 Family Services.

22 Q And how long did you work for them?

23 A Which one?

24 Q For Coastal Correctional?

25 A It may have been a year. I can't really

1 J. NORMAN

2 Q So can you walk me through that a little  
3 bit. Currently what would those goals be for you?

4 A I really can't give you any specifics.  
5 Because it's been a while since I made a bonus. So I  
6 really can't give you any specifics.

7 Q Are you familiar with the policies and  
8 procedures governing the facility?

9 A Yes.

10 Q And do they apply equally to everyone  
11 detained at Stewart?

12 A Correct.

13 Q And are you familiar with the  
14 Performance-Based National Detention Standards?

15 A The PBNDS?

16 Q Uh-huh?

17 A Yes.

18 Q And what are those?

19 A I really couldn't sit here verbatim and  
20 tell you what they are.

21 Q Just generally?

22 A I know that the PBNDS governs the things  
23 that we are -- we're supposed to do by law and how  
24 you treat the detainees. It also assists you with  
25 your audit, too, which lays out all the things that

1

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] What does a typical laundry worker day

9 look like?

10 A They basically take the clothes, go down  
11 to the housing units. The clothes are pushed out.

12 They push the clothing bins back to the laundry and  
13 weigh the clothes, put the clothes in the washing  
14 machine, which we have washers. Dry the clothes.

15 Once the clothes are finished, put them back in the  
16 buggy, and they send them back to the units.

17 Q Do you know how many hours they typically  
18 work a day?

19 A They cannot work no more than 40, two  
20 days off.

21 Q But do you know how many hours they work  
22 on average a day?

23 A No, ma'am. I'd have to look at their  
24 schedule to determine that.

25 Q So do you agree with this e-mail that

1 J. NORMAN

2 units because they changed jobs or didn't work  
3 anymore?

4 A If they was in the kitchen dorm and they  
5 didn't -- no longer wanted to work in the kitchen,  
6 then we would take them out of the kitchen dorm and  
7 put them in another dorm that -- per their  
8 classification level.

9 Q I'm going to go --

10 A The thing is that, if anybody's going in  
11 the kitchen dorm, we explain to them that it was the  
12 kitchen dorm, and that they had to work in the  
13 kitchen in order to stay in that dorm.

14 (Plaintiffs' (Norman) Exhibit No.

15 32 was marked for the record.)

16 BY MS. COLBY:

17 Q I'm going to pull up the next exhibit,  
18 CCBVA 243796. This is an e-mail from you to several  
19 CoreCivic employees dated April 2020. And you say:  
20 Now that the crisis is over with the detainees  
21 wanting to protest, we will go back to working our  
22 regular schedule. Thank you for all your help during  
23 this time of need.

24 Do you see that?

25 A Yes, I see that.

## D I S C L O S U R E

4 STATE OF GEORGIA ) DEPOSITION OF:

6 FULTON COUNTY ) JACQUELINE NORMAN

8 Pursuant to Article 8.B of the Rules and  
9 Regulations of the Board of Court Reporting of the  
Judicial Council of Georgia, I make the following  
disclosure:

10 I am a Georgia Certified Court Reporter. I am  
11 here as a representative of TSG Reporting.

12           TSG Reporting was contacted by the offices of  
13           Southern Poverty Law Center to provide court  
14           reporting services for this deposition. TSG  
                Reporting will not be taking this deposition under  
                any contract that is prohibited by O.C.G.A. 15-14-37  
                (a) and (b).

16 TSG Reporting has no contract or agreement to  
17 provide court reporting services with any party to  
the case, or any reporter or reporting agency from  
whom a referral might have been made to cover the  
deposition.

18                   TSG Reporting will charge its usual and  
19 customary rates to all parties in the case, and a  
20 financial discount will not be given to any party in  
this litigation.

Yanya Page

Tanya L. Verhoven-Page,  
Certified Court Reporter,  
B-1790.

## C E R T I F I C A T E

4 STATE OF GEORGIA:

5 FULTON COUNTY:

I hereby certify that the foregoing deposition was reported, as stated in the caption, and the questions and answers thereto were reduced to written page under my direction, that the preceding pages represent a true and correct transcript of the evidence given by said witness.

I further certify that I am not of  
kin or counsel to the parties in the  
case, am not in the regular employ of  
counsel for any of said parties, nor am I  
in any way financially interested in the  
result of said case.

Dated this 23rd day of November,  
2021

Yanya Page

Tanya L. Verhoven-Page,  
Certified Court Reporter,  
B-1790.